

REMARKS

Claims **1-24** and **33-36** were pending.

Claims **1-24** and **33-36** stand rejected.

Claims **1, 2, 9, 10** and **33** have been amended. No new matter has been added.

Claims **37 and 38** have been added. No new matter has been added.

No claims have been cancelled.

Therefore, claims **1-24** and **33-38** remain pending.

Support for the claim amendments can be found throughout the present Patent Application and the Provisional Patent Application No. 60/457,271 filed March 24, 2003 (the "Provisional Application") from which the current Application claims priority (as well as incorporates the Provisional Application by reference). For example, support for the claim amendments can be found at least on pages 20 and 21 and Fig. 9, as well as on pages 1, 7, 15, 16, and 18 of the Appendix of the Provisional Application, as well as at other points in the present Patent Application.

Rejection of Claims under 35 U.S.C. §103

Claims 1-24 and 33-36 are rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 5,708,828 ("Coleman") in view of U. S. Patent No. 5,446, 880 ("Balgeman"), and further in view of U.S. Patent Publication No. 2002/0178077 ("Katz"). Applicants respectfully traverse this rejection.

Applicants respectfully submit that Coleman, Balgeman, and Katz, alone or in any rational combination, fail to teach or suggest all the elements of claim 1, including:

generating intermediate source inventory location information by converting the
source inventory location information into an intermediate format,
wherein
the converting the source inventory location information into an
intermediate format comprises
determining whether a record exists, wherein
the record is associated with the source inventory location
information,
if the record exists, accessing a common object, wherein
the common object is associated with the record,

if the record does not exist, creating the record and the common object, and
the common object comprises the intermediate source inventory location information

Coleman relates to a data conversion system which converts data between different software and hardware platforms. *Coleman*, Abstract. Coleman, in general terms, discusses aspects related to a data conversion language/engine (DCLE), which converts data from different types of data to a data standard having a pre-defined generic data type, and then converts from this generic data type to a new desired data type and stores the result on a destination platform. *Coleman*, 2:44-54. However, insofar as Applicants are able to discern, Coleman does not teach or suggest any concepts comparable to converting source inventory location information into an intermediate format, particularly where such converting includes determining the existence of a record that is associated with the source inventory location information. This being the case, Coleman, must, by definition, also fail to teach or suggest, if such a record exist, accessing a common object, wherein the common object is associated with the record. Coleman thus must also fail to teach or suggest, if such a record does not exist, creating the record and the common object, where the common object includes the source inventory location information in the intermediate format, all as recited in claim 1. Applicants therefore respectfully submit that Coleman fails to teach or suggest at least these features of claim 1, among others.

Balgeman does not remedy the deficiencies of Coleman. Balgeman, in general terms, discusses aspects of a database interface that provides a translation from a record format of a given database to a standardized format for transmission to other nodes, thus providing translation between different databases formats. *Balgeman*, Abstract. In Balgeman, subsequent updates of a record by any node are automatically distributed to the other nodes by utilizing a standardized record format. *Balgeman*, 8:51-60. However, insofar as Applicants are able to discern, Balgeman fails to show, teach or suggest any concept even remotely comparable to the elements of claim 1 reproduced above. Applicants therefore respectfully submit that Balgeman, taken alone or in any rational combination with Coleman (which also fails to teach these features), also fails to show, teach, or suggest at least these features of claim 1, among others.

Katz also fails to remedy these deficiencies. Insofar as Applicants are able to discern, Katz also fails to show, teach or suggest any concept even remotely comparable to the elements of claim 1 reproduced above. Applicants therefore respectfully submit that Katz, taken alone or

in any rational combination with Coleman and/or Balgeman (which also fail to teach these features), also fails to show, teach, or suggest at least these features of claim 1, among others.

In summary, since the combination of Coleman, Balgeman, and Katz does not teach or suggest each and every feature of claim 1, the combination of Coleman, Balgeman, and Katz cannot render claim 1 obvious. Furthermore, independent claims 9 and 33 are patentable over Coleman, Balgeman, and Katz for similar reasons to independent claim 1, and further in view of their own features. Still further, claims 2-8, which depends from independent claim 1, claims 10-24, which depend from independent claim 9, and claims 34-36, which depend from independent claim 33, are patentable over Coleman, Balgeman, and Katz for at least the reasons provided for their respective base independent claims, and further in view of their own features. Accordingly, Applicants respectfully request that the rejection of claims 1-24 and 33-36 under 35 U.S.C. § 103(a) be reconsidered and withdrawn.

New Claims 37 and 38

New claims 37 and 38 are added herein. Support for the new claims can be found throughout the present Patent Application and the Provisional Application. For example, support for the new claims can be found at least on pages 20, 21, 24, and 25 of the Provisional Application, among others.

New claims 37 and 38 are dependent on independent claim 1. Applicants respectfully submit that these new claims are allowable at least for the reasons stated for independent claim 1.

CONCLUSION

Applicants submit that all claims are now in condition for allowance, and an early notice to that effect is earnestly solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is requested to telephone the undersigned.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicants hereby petition for such extensions. Applicants also hereby authorize that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to deposit account 502306.

Respectfully submitted,

/ Samuel G. Campbell III /

Samuel G. Campbell III
Attorney for Applicants
Reg. No. 42,381
512-439-5084 (direct)
512-439-5099 (fax)